

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
OFFICE OF AIR QUALITY**

**Sullair Corporation
3700 East Michigan Blvd.
Michigan City, Indiana 46360**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 091-14964-00017	
Original signed by Paul Dubenetzky Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 4, 2002 Expiration Date: March 4, 2007

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary industrial air and gas compressor manufacturing source.

Authorized Individual:	Edwin W. Laprade
Source Address:	3700 East Michigan Blvd., Michigan City, Indiana 46360
Mailing Address:	3700 East Michigan Blvd., Michigan City, Indiana 46360
General Source Phone Number:	219-879-5451
SIC Code:	3563
County Location:	LaPorte
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) spray paint booth, known as the Small Paint Booth, constructed in 1993, equipped with electrostatic air atomized spray equipment and dry filters for PM overspray control, exhausting through Stacks 64 and 65, capacity: 50 metal compressor parts per hour.
- (b) One (1) spray paint booth, known as the Large Paint Booth, constructed prior to 1975, equipped with electrostatic air atomized spray equipment and dry filters for PM overspray control, exhausting through Stacks 67, 68, 69 and 70, capacity: 10 metal compressor parts per hour.
- (c) One (1) spray paint booth, known as the Building 2 Paint Booth, constructed in 1976 and relocated within the source in 1982, equipped with air atomization spray equipment and dry filters for PM overspray control, exhausting through Stack 2-11, capacity: 20 metal compressor parts per hour.
- (d) One (1) cold solvent cleaning system, constructed after July 1, 1990, maximum solvent usage: 48,907 pounds per year.
- (e) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with the nine (9) test bays exhausting through Stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99 and 100 and the two (2) concrete exhausting directly outside, maximum capacity: 16.9 million British thermal units per hour, total.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including, but not limited to four (4) boilers, identified as B-01 through B-04, constructed in 1993, capacity: 0.175 million British thermal units per hour, total. [326 IAC 6-2-4]
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (d) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Antifreeze AST and portable compressor radiator filling operation; ethylene glycol; may qualify as a trivial activity with emissions less than one (1) pound per day.
- (i) Ten (10) Hobb machines that use Perkut 226-HD machining oil as a cutting fluid; a small amount of VOC may be emitted as oil mist.
- (j) Coating with spray cans with VOC emissions less than 15.0 pounds per day. [326 IAC 6-3-2]
- (k) Brazing and welding operations. [326 IAC 6-3-2]
- (l) High-pressure steam washers for cleaning metals, using only non-VOC, non-HAP materials.
- (m) One (1) potassium hydrate stripping operation, using only non-VOC, non-HAP materials.
- (n) Air from test compressors, which is exhausted into the building and may contain trace levels of lubricating oil particulate. Particulate emissions are less than 0.1 pound per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted

by this permit.

- (b) All previous registrations and permits are superseded by this permit.

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM,

OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Northwest Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section),
or
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Telephone No. of Northwest Regional Office: 219-881-6712
Facsimile No. of Northwest Regional Office: 219-881-6745

Failure to notify IDEM, OAQ / Northwest Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;

- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists

independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating

scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of

receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8] [326 IAC 2-2]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source is less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

(e) Condition C.1, Condition D.1.1(b) and Condition D.1.2 from FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998, which include a 365 day limit of regulated pollutants and HAPs, and fixed monthly limits of VOC and HAPs are no longer applicable because the potential to emit of each criteria pollutant is limited in this condition permit to less than 100 tons per twelve (12) consecutive month period, and the potential to emit of each individual HAP and the potential to emit of total HAPs is limited in this condition to less than ten (10) tons per twelve (12) consecutive month period and twenty-five (25) tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7, Part 70, are still not applicable, and Conditions C.1, D.1.1(b) and D.1.2 of FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998, are hereby rescinded.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or

(C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.14 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
 - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
 - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
 - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
 - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
 - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

C.18 Nonapplicability of Emission Statement

Condition C.13 of FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998, which requires an annual emission statement is no longer applicable because this source is located in LaPorte County and the potentials to emit CO, VOC, PM₁₀, NO_x and SO₂ are less than one hundred (100) tons per year, after the limits in the FESOP. Thus, Condition C.13 of FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998 is hereby rescinded.

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Spray paint booths and cold solvent cleaning system

- (a) One (1) spray paint booth, known as the Small Paint Booth, constructed in 1993, equipped with electrostatic air atomized spray equipment and dry filters for PM overspray control, exhausting through Stacks 64 and 65, capacity: 50 metal compressor parts per hour.
- (b) One (1) spray paint booth, known as the Large Paint Booth, constructed prior to 1975, equipped with electrostatic air atomized spray equipment and dry filters for PM overspray control, exhausting through Stacks 67, 68, 69 and 70, capacity: 10 metal compressor parts per hour.
- (c) One (1) spray paint booth, known as the Building 2 Paint Booth, constructed in 1976 and relocated within the source in 1982, equipped with air atomization spray equipment and dry filters for PM overspray control, exhausting through Stack 2-11, capacity: 20 metal compressor parts per hour.
- (d) One (1) cold solvent cleaning system, constructed after July 1, 1990, maximum solvent usage: 48,907 pounds per year.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-8-4] [326 IAC 8-6-2(a)]

The total volatile organic compound (VOC) delivered to the coating applicators in the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth), and the VOC used at the one (1) cold solvent cleaning system shall not exceed a total of 96.5 tons per twelve (12) consecutive month period. This will limit the VOC emissions from the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) and one (1) cold solvent cleaning system, to 96.5 tons per year, and, in combination with Condition D.2.1, limit VOC emissions from the entire source to less than one hundred (100) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply. This limit will also satisfy the requirements of 326 IAC 8-6-2(a).

D.1.2 Hazardous Air Pollutants (HAPs) Limitations [326 IAC 2-8-4]

- (a) The worst case single HAP delivered to the coating applicators in the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth), and used at the one (1) cold solvent cleaning system shall not exceed a total of 9.9 tons per twelve (12) consecutive month period. This will limit the individual HAP emissions from the total of the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) and one (1) cold solvent cleaning system to 9.9 tons per year, and limit individual HAP emissions from the entire source to less than ten (10) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The combination of HAPs delivered to the coating applicators in the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth), and the total HAPs used at the one (1) cold solvent cleaning system shall not exceed a total of 24.8 tons per twelve (12) consecutive month period. This will limit the total HAP emissions from the total of the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) and one (1) cold solvent cleaning system to 24.8 tons per year, and, in combination with Condition D.2.1, limit total HAP emissions from the entire source to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.

D.1.3 Particulate Matter (PM₁₀) [326 IAC 2-8-4]

The solids delivered to the applicators at the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) shall not exceed 9,650 tons per twelve (12) consecutive month period. Based on a fifty percent (50%) transfer efficiency and a ninety-eight percent (98%) control efficiency, this throughout limit is equivalent to a potential to emit PM₁₀ from the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) of no more than 96.5 tons per year and the potential to emit PM₁₀ from the total of all facilities at this source of less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable. As a result of this PM₁₀ limit, and since PM is equal to PM₁₀ at the three (3) spray paint booths, the PM emissions from the entire source will be limited to 99.6 tons per year.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) Pursuant to F 091-5794-00017, issued on December 10, 1996, the total volatile organic compound (VOC) delivered to the coating applicators at the one (1) spray paint booth, identified as the Small Paint Booth, shall be limited to less than 15 pounds per day. Therefore, the requirements of 326 IAC 8-2-9 are not applicable.
- (b) Condition D.1.1(c) from FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998, which states that the volatile organic compound (VOC) content of coatings applied to the metal compressors at the Building 3 spray booth shall be limited to 3.5 pounds per gallon of coating less water delivered to the applicator in a coating operation that is air dried or forced warm air dried at temperatures up to 194°Fahrenheit is no longer applicable because the Building 3 spray booth was never constructed and is not included in this FESOP. Thus, Condition D.1.1(c) of FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998, is hereby rescinded.

D.1.5 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold solvent cleaning system shall ensure that the following requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

- (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.
- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
- (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
- (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold solvent cleaning system shall ensure that the following operating requirements are met:
 - (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.
- (c) Compliance with this condition shall also ensure compliance with 326 IAC 8-3-2.

D.1.7 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) and any control devices.

Compliance Determination Requirements

D.1.8 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Conditions D.1.1 and D.1.4(a) shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating and solvent manufacturers.

D.1.9 VOC Emissions

- (a) Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.
- (b) Compliance with Condition D.1.4(a) shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the day.

D.1.10 Hazardous Air Pollutants (HAPs)

Compliance with the HAPs usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating and solvent manufacturers.

D.1.11 Hazardous Air Pollutants (HAPs) Emissions

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total single and total combination HAPs usage for the twelve (12) month period.

D.1.12 Particulate Matter (PM and PM₁₀)

In order to comply with Conditions D.1.3 and D.1.5, the dry filters for PM and PM₁₀ control shall be in operation at all times when the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.13 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (64, 65, 67, 68, 69, 70 and 2-11) while one or more of the booths exhausting to that stack are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.14 Nonapplicability of Daily Visible Emissions Notations

The requirement from FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998, Condition D.1.10 to perform daily visible emissions notations has not been included in the renewal. This requirement is no longer applicable because the daily inspections of the filter, weekly observations of the overspray from the stacks and monthly inspections of emissions required by Condition D.1.12 are sufficient compliance monitoring requirements to ensure compliance with the applicable rules. Thus, Condition D.1.10 of FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998 is hereby rescinded.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.15 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.1.1, the HAP usage limits and the HAP emission limits established in Condition D.1.2 and the solids usage limit and PM₁₀ emission limit in Condition D.1.3.
- (1) The amount and VOC, HAP and solids content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup and degreasing solvents;
 - (2) The cleanup solvent usage for each month;
 - (3) The degreasing solvent usage for each month;
 - (4) The total VOC, total solids, total individual HAP and total combination of HAPs usage for each month; and
 - (5) The weight of VOCs, PM₁₀, individual and total HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4(a), the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limit established in Condition D.1.4(a).
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each day;
 - (4) The total VOC usage for each day; and

- (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.3, D.1.5, D.1.12, and D.1.13, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.16 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4(a) shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Test Cells

- (e) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with the nine (9) test bays exhausting through Stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99 and 100 and the two (2) concrete exhausting directly outside, maximum capacity: 16.9 million British thermal units per hour, total.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 FESOP Limits and PSD Minor Source Status [326 IAC 2-2] [326 IAC 2-8-4] [40 CFR 52.21]

Pursuant to F 091-5794-00017, issued on December 10, 1996, the throughput of diesel fuel at the source shall not exceed 100,000 gallons per twelve (12) consecutive month period. This will limit the potential to emit NO_x to 30.2 tons per twelve (12) consecutive month period, the potential to emit PM and PM₁₀ to less than 2.12 tons per twelve (12) consecutive month period, the potential to emit VOC to 2.47 tons per twelve (12) consecutive month period, the potential to emit SO₂ to 1.99 tons per twelve (12) consecutive month period, the potential to emit CO to 6.51 tons per twelve (12) consecutive month period, and the potential to emit total HAPs to 0.026 tons per twelve (12) consecutive month period, based on a heating value of 137,000 British thermal units per gallon. This limit, in combination with Conditions D.1.1, D.1.2 and D.1.3, shall limit the potential to emit VOC, PM₁₀ and NO_x from the entire source to less than 100 tons per year and the potential to emit any combination of HAPs to less than 25 tons per year, and shall make the requirements of 326 IAC 2-7, not applicable. Since this limits NO_x emissions to less than 250 tons per consecutive twelve (12) month period, the requirements of 326 IAC 2-2, Prevention of Significant Deterioration, are also not applicable.

Compliance Determination Requirements

D.2.2 Fuel Usage

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the diesel fuel usage for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.3 Visible Emissions Notations

- (a) Visible emission notations of the test bays stacks exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.4 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records of the amount of diesel fuel used each month and the monthly average heating value of the fuel.
- (b) To document compliance with Condition D.2.3, the Permittee shall maintain records of visible emission notations of the test bays stacks exhausts once per shift.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including, but not limited to four (4) boilers, identified as B-01 through B-04, constructed in 1993, capacity: 0.175 million British thermal units per hour, total. [326 IAC 6-2-4]
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (d) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Antifreeze AST and portable compressor radiator filling operation; ethylene glycol; may qualify as a trivial activity with emissions less than one (1) pound per day.
- (i) Ten (10) Hobb machines that use Perkut 226-HD machining oil as a cutting fluid; a small amount of VOC may be emitted as oil mist.
- (j) Coating with spray cans with VOC emissions less than 15.0 pounds per day. [326 IAC 6-3-2]
- (k) Brazing and welding operations. [326 IAC 6-3-2]
- (l) High-pressure steam washers for cleaning metals, using only non-VOC, non-HAP materials.
- (m) One (1) potassium hydroxide stripping operation, using only non-VOC, non-HAP materials.
- (n) Air from test compressors, which is exhausted into the building and may contain trace levels of lubricating oil particulate. Particulate emissions are less than 0.1 pound per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter Limitation (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a), for indirect heating units constructed after September 1, 1983 and having a total source heat input capacity less than 10 million British thermal units per hour, the PM emissions shall not exceed 0.6 pound per million British thermal unit. Therefore, the PM from the four (4) insignificant boilers is limited to 0.6 pound per million British thermal units.

D.3.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the PM from the insignificant brazing and welding and coating with spray cans shall not exceed 0.551 pound per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the PM shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Sullair Corporation
Source Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
FESOP No.: 091-14964-00017

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

- ☒ Annual Compliance Certification Letter
- ☐ Test Result (specify) _____
- ☐ Report (specify) _____
- ☐ Notification (specify) _____
- ☐ Affidavit (specify) _____
- ☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Sullair Corporation
Source Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
FESOP No.: 091-14964-00017

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
 CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Monthly Report

Source Name: Sullair Corporation
Source Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
FESOP No.: 091-14964-00017
Facility: One (1) spray paint booth, identified as the Small Paint Booth
Parameter: VOC delivered to the applicators
Limit: Less than 15 pounds per day

Month: _____ Year: _____

Day	VOC delivered to the applicators (lbs)	Day	VOC delivered to the applicators (lbs)
1		17	
2		18	
3		19	
4		20	
5		21	
6		22	
7		23	
8		24	
9		25	
10		26	
11		27	
12		28	
13		29	
14		30	
15		31	
16		No. of deviations	

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Sullair Corporation
Source Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
FESOP No.: 091-14964-00017
Facilities: Three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) and one (1) cold solvent cleaning system
Parameter: VOC delivered to the applicators at the three (3) paint booths plus VOC usage at the solvent cleaning system
Limit: No more than 96.5 tons per twelve (12) consecutive month period, total

YEAR: _____

Month	VOC (tons)	VOC (tons)	VOC (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Sullair Corporation
Source Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
FESOP No.: 091-14964-00017
Facilities: Three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) and one (1) cold solvent cleaning system
Parameter: The worst case single HAP delivered to the coating applicators at the three (3) spray paint booths and used at the solvent cleaning system
Limit: No more than 9.9 tons per twelve (12) consecutive month period, total

YEAR: _____

Month	Worst Case Individual HAP (tons)	Worst Case Individual HAP (tons)	Worst Case Individual HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Sullair Corporation
Source Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
FESOP No.: 091-14964-00017
Facilities: Three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) and one (1) cold solvent cleaning system
Parameter: The combination of HAPs delivered to the coating applicators in the three (3) spray paint booths and the total HAPs used at the one (1) cold solvent cleaning system
Limit: No more than 24.8 tons per twelve (12) consecutive month period

YEAR: _____

Month	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Sullair Corporation
Source Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
FESOP No.: 091-14964-00017
Facilities: Three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth)
Parameter: Total solids delivered to the applicators
Limit: No more than 9,650 tons per twelve (12) consecutive month period

YEAR: _____

Month	Solids (tons)	Solids (tons)	Solids (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Sullair Corporation
Source Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
FESOP No.: 091-14964-00017
Facilities: Test cell building
Parameter: Diesel fuel throughput
Limit: No more than 100,000 gallons per twelve (12) consecutive month period

YEAR: _____

Month	Fuel Throughput (gallons)	Fuel Throughput (gallons)	Fuel Throughput (gallons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Sullair Corporation
Source Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
Mailing Address: 3700 East Michigan Blvd., Michigan City, Indiana 46360
FESOP No.: 091-14964-00017

Months: _____ to _____ Year: _____

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This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality**

**Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name:	Sullair Corporation
Source Location:	3700 East Michigan Blvd., Michigan City, Indiana 46360
County:	LaPorte
SIC Code:	3563
Operation Permit No.:	F 091-14964-00017
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Sullair Corporation relating to the operation of an industrial air and gas compressor manufacturing source. Sullair Corporation was issued FESOP 091-5794-00017 on December 10, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) spray paint booth, known as the Small Paint Booth, constructed in 1993, equipped with electrostatic air atomized spray equipment and dry filters for PM overspray control, exhausting through Stacks 64 and 65, capacity: 50 metal compressor parts per hour.
- (b) One (1) spray paint booth, known as the Large Paint Booth, constructed prior to 1975, equipped with electrostatic air atomized spray equipment and dry filters for PM overspray control, exhausting through Stacks 67, 68, 69 and 70, capacity: 10 metal compressor parts per hour.
- (c) One (1) spray paint booth, known as the Building 2 Paint Booth, constructed in 1976 and relocated within the source in 1982, equipped with air atomization spray equipment and dry filters for PM overspray control, exhausting through Stack 2-11, capacity: 20 metal compressor parts per hour.
- (d) One (1) cold solvent cleaning system, constructed after July 1, 1990, maximum solvent usage: 48,907 pounds per year.
- (e) One (1) test cell building, consisting of nine (9) test bays and two (2) outdoor concrete test pads, constructed in 1993, accommodating portable internal combustion diesel oil-fired machines, with the nine (9) test bays exhausting through Stacks 78, 79, 81, 82, 85, 86, 87, 89, 94, 95, 96, 97, 98, 99 and 100 and the two (2) concrete exhausting directly outside, maximum capacity: 16.9 million British thermal units per hour, total.

Note that the following permitted emission unit has not been constructed at the source and, upon request of the applicant, is not permitted in this FESOP: One (1) spray paint booth, identified as the Building 3 paint booth, with a maximum capacity of coating 3.0 metal compressors per day, utilizing air atomization application with dry filters for particulate control, and exhausting through one (1) stack (S/V ID ST-1).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including, but not limited to four (4) boilers, identified as B-01 through B-04, constructed in 1993, capacity: 0.175 million British thermal units per hour, total. [326 IAC 6-2-4]
- (b) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (c) Vessels storing lubricating oil, hydraulic oils, machining oils, and machining fluids.
- (d) Equipment used exclusively for filling drums, pails or other packaging containers with lubricating oils, waxes, and greases.
- (e) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (g) Paved and unpaved roads and parking lots with public access.
- (h) Antifreeze AST and portable compressor radiator filling operation; ethylene glycol; may qualify as a trivial activity with emissions less than one (1) pound per day.
- (i) Ten (10) Hobb machines that use Perkut 226-HD machining oil as a cutting fluid; a small amount of VOC may be emitted as oil mist.
- (j) Coating with spray cans with VOC emissions less than 15.0 pounds per day. [326 IAC 6-3-2]
- (k) Brazing and welding operations. [326 IAC 6-3-2]
- (l) High-pressure steam washers for cleaning metals, using only non-VOC, non-HAP materials.
- (m) One (1) potassium hydrate stripping operation, using only non-VOC, non-HAP materials.
- (n) Air from test compressors, which is exhausted into the building and may contain trace levels of lubricating oil particulate. Particulate emissions are less than 0.1 pound per hour.

Existing Approvals

- (a) FESOP 091-5794-00017, issued on December 10, 1996; and expired on December 10, 2001, and
- (b) First Significant Revision SMF091-9389, issued on August 5, 1998.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998

- (1) Condition C.1, Overall Source Limit, which states:

Pursuant to 326 IAC 2-8, emissions of any regulated pollutant from the entire source shall not exceed 99 tons per 365 day period. Emissions of hazardous air pollutants (HAP) from the entire source shall not exceed 9 tons per 365 day period for any individual HAP of 24 tons per 365 day period of any combination of HAPS. Emissions shall include those from all emission points at the source including those that are insignificant as defined in 326 IAC 2-7-1(20). The source shall be allowed to add insignificant activities not already listed in this permit, as long as the total emissions from the source do not exceed the above specified limits. In the event that any condition or combination of conditions in Section D of this permit differs from the above, the most restrictive limit will prevail;

- (2) Condition D.1.1(b), which states:

The total volatile organic compound (VOC) emissions from the four (4) paint booths (Small Paint Booth, Large Paint Booth, Building 2 Paint Booth, and Building 3 Paint Booth) plus the two (2) cold cleaning systems shall not exceed 8.02 tons per month. Therefore, the requirements of 326 IAC 2-7 do not apply; and

- (3) Condition D.1.2, Hazardous Air Pollutants, which states:

The hazardous air pollutant emissions from the entire source shall be limited as follows:

- (A) A single hazardous air pollutant (HAP) emissions shall not exceed 0.75 tons per month.
 - (B) Any combination of HAPS emissions shall not exceed 2.0 tons per month.

Therefore, the requirements of 326 IAC 2-7 do not apply.

Reason not incorporated: The potential to emit of each criteria pollutant will be limited in this permit to less than 100 tons per twelve (12) consecutive month period. The potential to emit of each individual HAP and the potential to emit of total HAPS will be limited in this permit to less than 10 tons per twelve (12) consecutive month period and 25 tons per twelve (12) consecutive month period, respectively. Therefore, the requirements of 326 IAC 2-7, Part 70, are still not applicable, but the emissions are distributed differently.

- (b) FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998

Condition D.1.10, Daily Visible Emissions Notations, which states:

Daily visible emission notations of the spray booth stack exhausts, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Reason not incorporated: The daily inspections of the filters, weekly observations of the overspray from the stacks and monthly inspections of the coating emissions required in this FESOP are sufficient compliance monitoring requirements to ensure compliance with the applicable rules.

- (c) FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998

Condition C.13, Emission Statement, which states:

- (1) The Permittee shall submit a certified, annual emission statement that meets the requirements of 326 IAC 2-6 (Emission Reporting). This annual statement must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year). The annual statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (2) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

Reason not incorporated: This source is located in LaPorte County and the potentials to emit CO, VOC, PM₁₀, NO_x and SO₂ are less than one hundred (100) tons per year, after the limits in the FESOP. Therefore 326 IAC 2-6 does not apply.

- (d) FESOP 091-5794-00017, issued on December 10, 1996, and First Significant Revision SMF091-9389, issued on August 5, 1998

Condition D.1.1(c) which states:

Pursuant to 326 IAC 8-2-9(d)(2) (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coatings applied to the metal compressors at the Building 3 spray booth shall be limited to 3.5 pounds per gallon of coating less water delivered to the applicator in a coating operation that is air dried or forced warm air dried

at temperatures up to 194°F Fahrenheit. Compliance with this limit shall be achieved pursuant to 326 IAC 8-1-2, using a daily volume weighted average of all coatings applied in the paint booth. This shall be calculated as follows:

Volume-Weighted Average = $\frac{\sum (\text{individual coating usage (gal/hr)} \times E_c)}{\sum (\text{coating usage (gal/hr)})}$

where: E_c = pounds of VOC per gallon of coating less water for each coating

The Volume Weighted Average for all coatings delivered to the Building 3 paint booth must be less than or equal to 3.5 pounds VOC per gallon. Solvent sprayed from the application equipment during clean up or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Reason not incorporated: The Building 3 spray booth was never constructed and is not included in this FESOP.

Enforcement Issue

- (a) IDEM is aware that the source did not apply for a FESOP Renewal in a timely manner.
- (b) IDEM is reviewing this matter and will take appropriate action.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on September 18, 2001. Additional information was received on December 26, 2001, and January 8, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/year)
PM	134
PM ₁₀	134
SO ₂	21.5
VOC	210
CO	75.8
NO _x	333

Note: For the purpose of determining Title V applicability for particulates, PM₁₀, not PM, is the regulated pollutant in consideration.

HAPS	Unrestricted Potential Emissions (tons/year)
Xylenes	85.8
Toluene	11.2
Ethylbenzene	17.3
1,1,1 - Trichloroethane	0.122
Perchloroethylene	0.122
MEK	7.61
MIBK	35.0
Glycol Ethers	16.2
Methanol	1.12
Benzene	0.069
1,3-Butadiene	0.003
Formaldehyde	0.087
Acetaldehyde	0.057
Acrolein	0.007
Naphthalene	0.006
TOTAL	175

- (a) The potentials to emit (as defined in 326 IAC 2-1.1-1(16)) of PM₁₀, NO_x and VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPS is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on December 10, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of the Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit.

Process/emission unit	Potential to Emit After Issuance (tons/year)						
	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPS
Three (3) spray paint booths (Large Paint Booth, Small Paint Booth and Building 2 Paint Booth) and Cold Solvent Cleaning System	96.5	96.5	-	96.5	-	-	9.9 individual 24.8 total
Test Cells	2.12	2.12	1.99	2.47	6.51	30.2	0.026
Insignificant Activities	0.956	1.33	0.039	1.02	5.52	6.57	0.124
Total PTE After Issuance	99.6	less than 100	2.03	less than 100	7.53	36.8	Single less than 10 Total less than 25

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status (attainment, maintenance attainment or unclassifiable; severe, moderate, marginal, or nonattainment)
PM ₁₀	Attainment
SO ₂	Maintenance
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as attainment or unclassifiable for ozone.
- (b) LaPorte County has been classified as attainment, maintenance attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Federal Rule Applicability

- (a) The four (4) insignificant boilers are not subject to the requirements of 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial- Institutional Steam Generating Units, because, although the boilers were constructed after June 9, 1989, the capacity of each boiler is less than ten (10) million British thermal units per hour.
- (b) There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (c) The cold solvent cleaning system is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Part 63, Subpart T, because the cold cleaning system does not use halogenated solvents in total concentration of greater than five percent (5%) by weight.
- (d) There are still no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR Part 61 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

All of the following rule applicabilities were true when the initial FESOP, F 019-5794-00017, was issued on December 10, 1996:

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential to emit NO_x is limited in the FESOP to less than one hundred (100) tons per year, so that the source complies with 326 IAC 2-8, FESOP. This limit will also limit NO_x emissions to less than 250 tons per year. The unrestricted potential to emit PM, PM₁₀, VOC, CO and SO₂ from the total of all facilities at this source is also less than 250 tons per year. Thus, this source is a minor source pursuant to 326 IAC 2-2, PSD, and the requirements of 326 IAC 2-2, PSD, are not

applicable. Specific limitations are listed under 326 IAC 2-8-4 (FESOP) in this section.

326 IAC 2-4.1-1 (New Source Toxics Control)

All facilities at this source were constructed prior to July 27, 1997. Therefore, the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in LaPorte County and the potentials to emit CO, VOC, PM₁₀, NO_x and SO₂ are less than one hundred (100) tons per year, after the limits in the FESOP. Therefore 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM₁₀, SO₂, VOC, CO and NO_x shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPS shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply.

- (a) Pursuant to F 091-5794-00017, issued on December 10, 1996, the throughput of diesel fuel at the source shall not exceed 100,000 gallons per twelve (12) consecutive month period. This will limit the potential to emit NO_x to 30.2 tons per twelve (12) consecutive month period, the potential to emit PM and PM₁₀ to less than 2.12 tons per twelve (12) consecutive month period, the potential to emit VOC to 2.47 tons per twelve (12) consecutive month period, the potential to emit SO₂ to 1.99 tons per twelve (12) consecutive month period, the potential to emit CO to 6.51 tons per twelve (12) consecutive month period, and the potential to emit total HAPS to 0.026 tons per twelve (12) consecutive month period, based on a heating value of 137,000 British thermal units per gallon. This limit, in combination with the limits listed below, limits the potential to emit VOC, PM₁₀ and NO_x from the entire source to less than 100 tons per year and the potential to emit any combination of HAPS to less than 25 tons per year, and shall make the requirements of 326 IAC 2-7, not applicable. Since this limits NO_x emissions to less than 250 tons per twelve (12) consecutive month period, the requirements of 326 IAC 2-2, Prevention of Significant Deterioration, are not applicable.
- (b) The amount of VOC delivered to the applicators at the total of the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth), and the VOC used at the one (1) cold solvent cleaning system, shall be limited to no more than 96.5 tons per twelve (12) consecutive month period, total. This limit, in combination with the VOC limit for the test cells above, will limit the potential to emit VOC from the entire source to less than 100 tons per year and shall make the requirements of 326 IAC 2-7, not applicable.
- (c) HAP emissions will be limited as follows:
 - (1) The worst case single HAP delivered to the coating applicators at the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth), and used at the one (1) cold solvent cleaning system shall not exceed 9.9 tons per twelve (12) consecutive month period, total. Therefore, the requirements of 326 IAC 2-7 do not apply.
 - (2) The combination of HAPS delivered to the coating applicators in the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth), and the total HAPS used at the one (1) cold solvent cleaning system shall not

exceed a total of 24.8 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 do not apply.

- (d) The solids delivered to the applicators at the three (3) spray paint booths (Small Paint Booth, Large Paint Booth and Building 2 Paint Booth) shall not exceed 9,650 tons per twelve (12) consecutive month period. Based on a fifty percent (50%) transfer efficiency and a control efficiency of ninety-eight percent (98%), when using dry filters, this throughput limit is equivalent to PM₁₀ emissions of 96.5 tons per year from the total of the three (3) spray paint booths and less than 100 tons per year from the total of all facilities at this source, when operating the dry filters at all times when the three (3) spray paint booths are in operation. Therefore, the requirements of 326 IAC 2-7 are not applicable. As a result of this PM₁₀ limit, and since PM is equal to PM₁₀ at the three (3) spray paint booths, the PM emissions from the entire source will be limited to 99.6 tons per year.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

All of the following rule applicabilities were true when the initial FESOP, F 019-5794-00017, was issued on December 10, 1996:

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The four (4) insignificant boilers, identified as B-01 through B-04, all constructed after September 21, 1983, must comply with the requirements of 326 IAC 6-2-4. The emission limitations are based on the following equation is given in 326 IAC 6-2-4:

$$Pt = 1.09/Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million British thermal units (lb/MMBtu) heat input

Q = Total source maximum operating capacity rating in million British thermal units per hour (MMBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

The heat input capacity of the four (4) boilers is 0.175 million British thermal units per hour, each, and 0.7 million British thermal units per hour, total, and the boilers were constructed as part of the

same modification. There were no boilers existing at this source, when these boilers were constructed.

$$Pt = 1.09/(0.7)^{0.26} = 1.20 \text{ lb/MMBtu heat input}$$

Pursuant to 326 IAC 6-2-4(a), for Q less than ten (10) million British thermal units per hour, Pt shall not exceed 0.6. Therefore, the PM emissions from the four (4) insignificant boilers is limited to 0.6 pound per million British thermal units heat input.

Based on AP-42 emission factors, the PM emissions from each of the four (4) boilers is as follows:

$$1.9 \text{ lb PM /mmcf} \times 1 \text{ mmcf/1,000 MMBtu} = 0.0019 \text{ lb PM/MMBtu}$$

Therefore, the four (4) insignificant boilers will comply with this rule.

326 IAC 6-3-2 (Process Operations)

- (a) Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the three (3) spray paint booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times the three (3) spray paint booths are in operation, in order to comply with this limit.

- (b) Pursuant to 326 IAC 6-3-2, the PM from the insignificant brazing and welding and coating with spray cans shall not exceed 0.551 pound per hour when operating at a process weight rate of less than 100 pounds per hour. When operating at a process weight rate of 100 pounds per hour or more, the PM shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

or

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40 \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

The potential to emit SO₂ from all facilities at this source is less than ten (10) pounds per hour and twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 7-1.1, Sulfur Dioxide Emission Limitations, are not applicable.

326 IAC 7-4-5 (Sulfur Dioxide Emission Limitations: LaPorte County)

This source is not listed in 326 IAC 7-4-5. Therefore, the requirements of 326 IAC 7-4-5 are not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

- (a) The requirements of 326 IAC 8-2-9 are not applicable to the Building 2 Paint Booth or the Large Paint Booth, because both were constructed prior to January 1, 1980 in LaPorte County.
- (b) Pursuant to F 091-5794-00017, issued on December 10, 1996, the potential to emit VOC from the one (1) spray paint booth, identified as the Small Paint Booth, is limited to less than 15 pounds per day. Therefore, the one (1) spray paint booth, identified as the Small Paint Booth, is not subject to the requirements of 326 IAC 8-2-9, because the booth was constructed after July 1, 1990 and the actual VOC emissions are less than 15 pounds per day.
- (c) The requirements of 326 IAC 8-2-9 are not applicable to the insignificant coating with spray cans because the potential to emit VOC is less than 15 pounds per day.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The one (1) cold solvent cleaning system was constructed after July 1, 1990 and does not have a remote solvent reservoir. Therefore, the requirements of 326 IAC 8-3-2, Organic Solvent Degreasing Operations: Cold Cleaner Operation and 326 IAC 8-3-5, Organic Solvent Degreasing Operations: Cold Cleaner Degreaser Operation and Control, are applicable. Compliance with 326 IAC 8-3-5 will satisfy the requirements of 326 IAC 8-3-2.

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaner degreaser shall ensure that the following requirements are met:
 - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
 - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF));
 - (B) The solvent is agitated; or
 - (C) The solvent is heated.

- (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.
 - (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
 - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
 - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38EC) (one hundred degrees Fahrenheit (100EF)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9EC) (one hundred twenty degrees Fahrenheit (120EF)):
 - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
 - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
 - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
 - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
 - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 8-6 (Organic Solvent Emission Limitations)

The one (1) spray paint booth, identified as the Large Paint Booth, was constructed prior to 1975, but the exact construction date is unknown. Therefore, construction of this source may have commenced after October 7, 1974, and did commence prior to January 1, 1980. The potential VOC emissions from this source are greater than 100 tons per year. Therefore, the requirements of 326 IAC 8-6 are applicable. Since the potential to emit VOC is limited to less than 100 tons per year, pursuant to 326 IAC 2-8-4, FESOP, the FESOP limit satisfies requirements of 326 IAC 8-6-2(a).

326 IAC 9-1-2 (Carbon Monoxide Emission Limits)

This source does not contain petroleum refining processes, ferrous metal smelters, or refuse

incineration and burning. Therefore, the requirements of 326 IAC 9-1-2, CO emissions: limits specified, are not applicable.

326 IAC 10-1 (Nitrogen Oxides Control in Clark and Floyd County)

This source is not located in Clark or Floyd counties. Therefore, the requirements of 326 IAC 10-1 are not applicable.

Testing Requirements

There are still no testing requirements for this source.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

- (a) The compliance monitoring requirements applicable to this source are as follows:
 - (1) The three (3) spray paint booths have the following compliance monitoring requirements:
 - (A) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (64, 65, 67, 68, 69, 70 and 2-11) while one or more of the booths exhausting to that stack are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
 - (B) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain trouble-shooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in

accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (C) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for overspray control must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

- (2) The test cell building has the following compliance monitoring requirements:

Visible emission notations of the test bays stacks exhausts shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

These monitoring conditions are necessary because the test bays must operate properly to ensure compliance with 326 IAC 2-8 (FESOP).

- (b) All compliance requirements from previous approvals were incorporated into this FESOP except the following:

Condition D.1.10, Daily Visible Emissions Notations, which states:

Daily visible emission notations of the spray booth stack exhausts, shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

Reason not incorporated: The daily inspections of the filter, weekly observations of the overspray from the stacks and monthly inspections of emissions required in this FESOP are sufficient compliance monitoring requirements to ensure compliance with the applicable rules.

Conclusion

The operation of this industrial air and gas compressor manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F 091-14964-00017.

**Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations**

Company Name: Sullair Corporation
Address City IN Zip: 3700 East Michigan Blvd., Michigan City, IN 46360
FESOP: 091-14964
Plt ID: 091-00017
Reviewer: CarrieAnn Paukowits
Date: September 18, 2001

Material	Density (lb/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential tons per year	lb VOC /gal solids	Transfer Efficiency
Sullair Global Green - Sml. Bth.	9.16	37.34%	0.0%	37.3%	0.0%	52.26%	0.10	50.0	3.42	3.42	17.10	410.44	74.91	62.85	6.54	50%
Sullair Global Green - Lrg. Bth.	9.16	37.34%	0.0%	37.3%	0.0%	52.26%	0.31	10.0	3.42	3.42	10.60	254.47	46.44	38.97	6.54	50%
SW Custom Colors - Sml. Bth.	9.90	45.00%	0.0%	45.0%	0.0%	48.00%	0.06	50.0	4.46	4.46	13.37	320.76	58.54	35.77	9.28	50%
SW Custom Colors - Lrg. Bth.	9.90	45.00%	0.0%	45.0%	0.0%	48.00%	0.17	10.0	4.46	4.46	7.57	181.76	33.17	20.27	9.28	50%
Primer - Bldg. 2	9.20	57.53%	0.0%	57.5%	0.0%	27.00%	0.05	20.0	5.29	5.29	5.29	127.03	23.18	8.56	19.60	50%
SW Xylene R2K2	7.17	100.00%	0.0%	100.0%	0.0%	0.00%	0.20	1.0	7.17	7.17	1.41	33.90	6.19	0.00	N/A	50%
Lacquer Thinner	7.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.24	1.0	7.25	7.25	1.70	40.89	7.46	0.00	N/A	50%

State Potential Emissions

Add worst case coating to all solvents

TOTAL:	36.1	867	158	110
Control Efficiency:	0.0%	0.0%	0.0%	98.0%
TOTAL After Control:	36.1	867	158	2.21

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
Hazardous Air Pollutants (HAPs) from Surface Coating

Company Name: Sullair Corporation
Address City IN Zip: 3700 East Michigan Blvd., Michigan City, IN 46360
FESOP: 091-14964
Pit ID: 091-00017
Reviewer: CarrieAnn Paukowits
Date: September 18, 2001

Material	Density (lb/gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % MEK	Weight % MIBK	Weight % Glycol Ethers	Weight % Methanol	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	MEK Emissions (tons/yr)	MIBK Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	Methanol Emissions (tons/yr)	Total Emissions (tons/yr)
Sullair Global Green - Sml. Bth.	9.16	0.10	50.0	20.00%	0.00%	5.00%	0.00%	0.00%	5.00%	0.00%	40.12	0.00	10.03	0.00	0.00	10.03	0.00	60.2
Sullair Global Green - Lrg. Bth.	9.16	0.31	10.0	20.00%	0.00%	5.00%	0.00%	0.00%	5.00%	0.00%	24.87	0.00	6.22	0.00	0.00	6.22	0.00	37.3
SW Custom Colors - Sml. Bth.	9.90	0.06	50.0	0.00%	0.00%	0.00%	3.00%	17.00%	5.00%	0.00%	0.00	0.00	0.00	3.90	22.11	6.50	0.00	32.5
SW Custom Colors - Lrg. Bth.	9.90	0.17	10.0	0.00%	0.00%	0.00%	3.00%	17.00%	5.00%	0.00%	0.00	0.00	0.00	2.21	12.53	3.69	0.00	18.4
Primer - Bldg. 2	9.20	0.05	20.0	35.00%	18.00%	0.00%	0.00%	0.00%	0.00%	0.00%	14.10	7.25	0.00	0.00	0.00	0.00	0.00	21.4
SW Xylene R2K2	7.17	0.20	1.0	85.00%	0.00%	15.00%	0.00%	0.00%	0.00%	0.00%	5.26	0.00	0.93	0.00	0.00	0.00	0.00	6.19
Lacquer Thinner	7.25	0.24	1.0	15.00%	50.00%	0.00%	20.00%	5.00%	0.00%	15.00%	1.12	3.73	0.00	1.49	0.37	0.00	1.12	7.84

Total State Potential Emissions

TOTALS:	(tons/yr):	85.5	11.0	17.2	7.61	35.0	16.2	1.12	133
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METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

**Appendix A: Emission Calculations
Degreasing Operations
VOC and HAP Emission Calculations**

**Company Name: Sullair Corporation
Address City IN Zip: 3700 East Michigan Blvd., Michigan City, IN 46360
FESOP: 091-14964
Pit ID: 091-00017
Reviewer: CarrieAnn Paukowits
Date: September 18, 2001**

Material	Maximum Consumption (lbs/yr)	Weight % VOC	Weight % Xylene	Weight % Toluene	Weight % Ethylbenzene	Weight % 1,1,1-Trichlorethane	Weight % Perchloroethylene	VOC Emissions (tons/yr)	Xylene Emissions (tons/yr)	Toluene Emissions (tons/yr)	Ethylbenzene Emissions (tons/yr)	1,1,1-Trichlorethane Emissions (tons/yr)	Perchloroethylene Emissions (tons/yr)	Total HAPs Emissions (tons/yr)
Degreasing														
	48907	100%	1.00%	0.50%	0.50%	0.50%	0.50%	24.5	0.245	0.122	0.122	0.122	0.122	0.734

Total State Potential Emissions

TOTALS:	(tons/yr):	24.5	0.245	0.122	0.122	0.122	0.122	0.734
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METHODOLOGY

VOC/HAPs emission rate (tons/yr) = Material Usage (lbs/hr) * Weight % VOC/HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emission Calculations
Internal Combustion Engines - Diesel Fuel
Turbine (>250 and <600 HP)
Reciprocating

Company Name: Sullair Corporation
Address City IN Zip: 3700 East Michigan Blvd., Michigan City, IN 46360
FESOP: 091-14964
Plt ID: 091-00017
Reviewer: CarrieAnn Paukowits
Date: September 18, 2001

Emissions calculated based on heat input capacity (MMBtu/hr)

Total
Heat Input Capacity
MM Btu/hr

16.9

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.31	0.31	0.29	4.41	0.36	0.95
Potential Emission in tons/yr	22.9	22.9	21.5	326	26.6	70.3

Emission Factor in lb/MMBtu	Hazardous Air Pollutant (HAP)								Total
	Benzene	Toluene	Xylenes	1,3 - Butadiene	Formaldehyde	Acetaldehyde	Acrolein	Naphthalene	
	0.000933	0.000409	0.000285	0.0000391	0.00118	0.000767	0.0000925	0.0000848	
Potential Emission in tons/yr	0.069	0.030	0.021	0.003	0.087	0.057	0.007	0.006	0.281

Methodology

Potential Throughput (hp-hr/yr) = hp * 8760 hr/yr

Use a conversion factor of 7,000 Btu per hp-hr to convert from horsepower to Btu/hr, unless the source supplies a source-specific brake-specific fuel consumption (AP-42, Footnote a, Table 3.3-1)

Emission Factors are from AP42 (Supplement B 10/96), Table 3.3-2

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] * 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

*PM emission factors are assumed to be equivalent to PM10 emission factors. No information was given regarding which method was used to determine the factor or the fraction of PM10 which is condensable.

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).